

CORRES CONTROL  
OUTGOING LTR #

DOE ORDER #

05-RF-00848

DIST	LTR	ENC
CROCKETT, G		
FERRERA, D.W.	X	X
GILPIN, H.E.		
LONG, J.W.		
LINDSAY, D. C.		
SHELTON, D.C.		
TUOR, N.R.		
SNYDER, D		
MCGRORY, M		
KAISER, M.		
BEAN, C.		
LINSIBIGLER, H		
NESTA, S.	X	X
PRIMROSE, A		
WIEMELT, K		



September 7, 2005

05-RF-00848

Richard J. Schassburger, Director  
Headquarters Cadre Project Management  
DOE, RFPO

TRANSMITTAL OF REVISION 1 OF DECOMMISSIONING CLOSEOUT REPORT FOR THE  
776/777 CLOSURE PROJECT AND RESPONSE TO COLORADO DEPARTMENT OF  
HEALTH AND ENVIRONMENT (CDPHE) COMMENTS – DWF-092-05

Enclosed are the responses to CDPHE comments on the Final Decommissioning Closeout  
Report for the 776/777 Closure Project, Type 3 Facility. Also enclosed is a Revision 1 to the  
Final Decommissioning Closeout Report for the 776/777 Closure Project, Type 3 Facility, with  
six color copies of Figure 4 and Appendix B. No other figures or appendices are included as  
they did not change from the original submittal.

The report is submitted to document completion of Deactivation and Decommissioning activities  
for the 776/777 Building complex. Transmittal to the CDPHE and the Environmental Protection  
Agency, in accordance with the Rocky Flats Clean-Up Agreement, is requested. Also, please  
submit a color copy of Figure 4 to both agencies.

If you have any questions, please contact Steve NESTA at extension 6386.

CORRES CONTROL	X	X
PATS		
ADMN. RECORD	X	X
WASTE REC CTR		
TRAFFIC		

CLASSIFICATION: Dennis W. Ferrera  
UCNI Vice President and Project Manager  
UNCLASSIFIED Remediation, Industrial D&D, and Site Services  
CONFIDENTIAL  
SECRET

AUTHORIZED CLASSIFIER SIGNATURE: KLM:rlm

NA  
Date: Enclosure:  
IN REPLY TO RFP CC #: As Stated

ACTION ITEM STATUS: Original and 1 cc – Richard J. Schassburger

☐ PARTIAL/OPEN cc:  
☐ CLOSED John Rampe

LTR APPROVALS:

(Last Name) \_\_\_\_\_  
(Last Name) \_\_\_\_\_

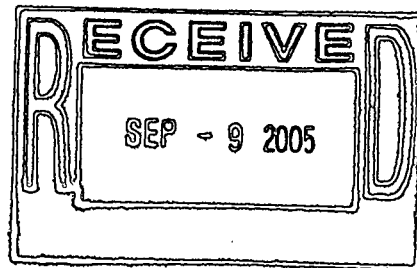
ORIG. &amp; TYPIST INITIALS:

AP

Letter # DWF-092-05

Kaiser-Hill Company, L.L.C.

Rocky Flats Environmental Technology Site, 10808 Highway 93, Unit B, T130F, Golden, CO 80403-8200 ♦ (303) 966-6386



ADMIN RECORD

B776-A-000307

## SUMMARY OF B776/777 RESPONSE TO COMMENTS TO CDPHE

- 1) Section 1.3 - This section should be modified to properly state what actions were performed and the results of those actions. Sub-sections 1 & 2 should include discussions of the air sampling and results as well as "Kray's Pans", and the construction of the berm around B776/777 to prevent surface water runoff. Sub-section 3 should discuss results of PAM samplers as well as the close-in sampling performed by the site as well as EPA. Sub-sections 5 & 6 should be modified to properly describe the building removal actions that occurred. Were all slabs completely removed, or just B776/777? B730 slab/bottom of tanks remains and was not completely removed. All contaminated soil was not removed! Some contaminated soil remains at depth, both rads and chemical associated with B730 and 776/777.

### Response:

In Section 1.3.1 and 1.3.2 a comment will be inserted to reference 2.5.1 Air Sampling During Demolition. Additionally, the following paragraphs will be added to 2.5.1 to address the "Kray's pans" and the EPA close-in sampling that was conducted.

- The 776 project did 10 air samples & 10 deposition pans that were surveyed every 2 hours when the project was working. Four air samplers ran 24 hours a day 7 days a week. No deposition pan was ever above 20 DPM. Only a few air samples were above the MDA, and none were above the action level, with the highest reading being 0.18 D.A.C.
- EPA operated four high volume air samplers for close-in monitoring around the B776/777 demolition area. Filters were recovered and analyzed on a weekly basis for Pu-239. All field samples were well below action level of 0.05pCi/m<sup>3</sup>. Data provided to the Site by EPA.

Section 1.3.5 will be modified as follows:

- All structures, except for two-thirds of the 730 slab were removed to at least three feet below grade. The building 776/777-floor slab was completely removed, as well as all process waste piping below the slab. All basement areas and buried equipment pits were completely removed. The two underground diesel storage tanks on the north side of 776 were completely removed (USTs No. 22 and 23). The four Building 730 underground concrete tanks were also completely removed. See Section 2.5 and ER Closeout Reports for IHSS Group 700-3 Volume I, May 2005, and Volume II, which will address UBCs 776, 777, and 778, and OPWL Tank 118, for additional information on structures remaining.

Section 1.3.5 will be modified as follows:

- All building structures and slabs were completely removed, except as note above. Contaminated soil remaining is addressed in ER Closeout Reports for IHSS Group 700-3 Volume I, May 2005, and Volume II, which will address UBCs 776, 777, and 778, and OPWL Tank 118. The site will be regraded using clean fill. Long-term stewardship goals for use as a wildlife refuge will be met.

- 2) Section 2.5 - Please modify the discussion to specifically identify the portions of buildings removed. That is, please indicate if the whole building/slab/footers/etc. were removed or not, and what remains. This discussion currently indicates that all of the buildings were removed yet other sections of this Report suggest the some of the slabs and below grade structures remain, please be precise as to what was removed and what remains.

### Response:

Other than two-thirds of the 730 slab, all structures were removed. The 730 slab is discussed in the ER Closeout Reports, since ER conducted this action.

- 3) Section 2.5.1 - Please add to this that EPA also set up close-in air samplers for B776/777 and performed air sampling for radiological concerns. The analytical results for all of which have yet to be received. However, those results that have been provided have not identified radiological contamination above levels of concern. As an added step "Kray's Pans" were sampled to identify levels of "fallout" around B776/777.

### Response:

As stated in item 1 above, this section has been modified to address these items.

- 4) Section 5.0 - Please modify this section to properly describe and show the remaining infrastructure and the condition of remaining utilities and lines. This would include condition (removal and/or how plugged/grouted) of storm lines and drains, sewer lines, OPWLs, NPWLs, foundation drains, etc. specifically associated with the demolition activities. Also the location of the tunnel that was plugged, and all remaining structural elements. In addition please provide appropriate figures.

**Response:**

Please see Figure 4 and Figure 5, which show the location and condition of the questioned lines. All remaining lines were plugged or grouted in accordance with approved work packages. The tunnel and all remaining structural elements (such as the portion of B730 slab) are addressed in ER Closeout Reports for IHSS Group 700-3 Volume I, May 2005, and Volume II, which will address UBCs 776, 777, and 778, and OPWL Tank 118.

- a) Please modify to recognize that the floor slab of the B730 tanks was not removed and remains in place.
  - b) Please include buildings 712A and 713A in these discussions regarding the demolition and remaining infrastructure. Was all of the below ground concrete structure removed for B712A and 713A?
  - c) 1<sup>st</sup> paragraph - Please change the references to Figure 7, as this figure does not appear to show the final configuration of this area as discussed. Please provide a figure that does identify any remaining building structures (slab, footers, foundation, walls, etc).
  - d) Please modify the discussion in the 1<sup>st</sup> and 4<sup>th</sup> paragraph to agree. Have all of the building structures been removed or not?
  - e) Since it is our understanding that all of B776/777 was removed and no structures remain for B776/777, nor does figure 6 provide any utility isolations or depths of utilities, please remove Figure 6 or explain what it is trying to show. In addition please provide appropriate information for the discussion provided and a figure that shows all of the facilities included in this report.
  - f) 4<sup>th</sup> paragraph - a) Since Figure 7 does not appear to show the remaining building foundations, please identify the correct figure or provide one.
- b) Since there is no Figure 8 provided either provide one or correct this reference.

**Response:**

Section 5 will be modified as follows:

All buildings in the 776/777 Closure Project were removed to at least three feet below final grade. Removal to this depth included removal of all building floor slabs. Building 776/777, 701, 702, 703, 710, 712, 712A, 713, 713A and 781 structures were removed, including all slabs, basements, footers, and foundations.

Underground process waste lines beneath the Building 776/777 slab were completely removed. Removed and remaining original process waste lines outside the building footprint are shown on Figure 54, along with storm drains, sewer and water lines, and foundation drains.

Underground utility lines (e.g., alarms, electrical, natural gas, nitrogen, water, etc.) were removed to at least three feet below final grade beneath the building footprints. Utilities outside the building footprints were air gapped, plugged, or otherwise isolated. Figure 6 5 shows the Building 776/777 Project Utility Isolations and depths below the surface. These depths relate to the existing ground surface at the time of isolation.

The only remaining building structures within the 776/777 Closure Project are were some footers and foundations below three feet of final grade associated with buildings ~~701, 702, 703, 710, 712, 713, and 781~~ 776/777, and the slab of 730, which were turned over to ER and are addressed

in the ER closeout reports. Final site contouring in this sector had not been completed at the time this report was prepared. However, final grading will be as shown on Figure 87.

Environmental Restoration activities conducted outside the scope of the 776/777 Closure Project DOP (e.g., under the ER RSOP) are summarized in a separate ER closeout report (Closeout Report for IHSS Group 700-3, Volume I, dated May 2005. Volume II will address UBCs 776, 777 and 778, and OPWL Tank 18).

- 4) Please properly account for all of the Figures provided. Currently there is no Figure 2 or 3 identified in this Report.

**Response:**

Figure 2 and 3 are in the body of the report (pages 15 and 16 respectively); however they do not have figure numbers as they were generated by other organizations for other purposes than this report. Figure 6 will be deleted as it is not valid. Figure 7 will remain the same.

- 5) Figure 4 - What is the difference between demolished structure and removed? This figure should show the outline of the former structures and the location of remaining building structures. In addition this figure and Fig 5 do not appear to agree as to the remaining and removed utilities. Please modify this figure to provide the correct information needed or provide another figure that provides this information.

**Response:**

On Figure 4 there should be no distinction between "demolished structure" and "removed." All structures were demolished and removed, except as previously noted. This figure was being used to show the status of the OPWL, sewer, water and storm drain lines.

- 7) -Figure 5 - This figure does not address the final configuration of the storm drains shown (need to provide a legend for storm drains), nor does it show any foundation drains (although not aware of any foundation drains associated with B776/777) as discussed in this document (2<sup>nd</sup> paragraph Section 5).

**Response:**

The status of storm drains are shown on Figure 4.

Comments B776/777 DD Closeout Report, Appendix B.

**RCRA Unit 61, Page B-1:** If possible, provide an exact closure date for use in EPA's RCRA Info tracking system. (Closures where only a month is available should be shown as the last day, or last working day, of the month for entry into RCRA Info by CDPHE.)

**Response:** The Closure Date in the Master List has been changed from 5/1/04 to 5/31/04 because no exact date could be determined in May 04.

**RCRA Unit 94.007 and 94.008, Page B-3:** If possible, provide an exact closure date of the tanks for use in EPA's RCRA Info tracking system.

**Response:** Tank II shows the tanks were removed on 3/15/01. That date will be reflected in both Appendix B and the Master List.

**RCRA Unit 776.3 (1<sup>st</sup> entry), Page B-4:** If possible, provide an exact closure date for use in EPA's RCRA Info tracking system.

SUMMARY OF B776/777 RESPONSE TO COMMENTS TO CDPHE

**Response:** The Closure Date in the Master List for the GB has been changed from 10/02 and 12/02 to 10/31/02 and 12/31/02 because no exact date in October and December could be determined. The Closure Date in the Master List for the floor has been changed from March 03 to 3/31/03 because no exact date could be determined in March.

**RCRA Unit 776.3 (2<sup>nd</sup> entry), Page B-4:** The Closure Info column entry indicates that mercury amalgamation will be conducted in the ASRF and, further, that the ASRF has been closed by debris cleaning. A review of the Unit 881.3B entry in the RCRA Master List does not include the unit in B776 nor describe its closure. Closure documentation/dates are needed. The report of "debris cleaning" indicates that a building log may provide the details and a closure date and would be preferable to referencing the Building DOP approval date. Please address. (Also, if correct, please show the closure date of 3/1/03 shown on the Master List.)

**Response:** Line 739 addresses the use Mercury Amalgamation under 881.3B in the ASRF and therefore no changes except the closing date was change to 3/31/03 because exact date could be determined in March 03

776.3	776	Mercury Amalgamation under 881.3B	No longer subject to RCRA regulation	One time: 10/17/02 Contact Record btw C. Hicks and James Hindman that TRM mercury amalgamation will be conducted in the ASRF under procedure 00-707/776-009. ASRF has been closed by debris cleaning.	Mar-03	3/31/03	776/777	N
-------	-----	-----------------------------------	--------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------	---------	---------	---

**RCRA Unit S002, Page B-4:** The RCRA Master List indicates closure of the unit was on 9/1/03, not merely Sep-03. The specific date suggests that a building log may provide the details and a closure date or reference a CR. If sufficient details are available a CR may be created to memorialize the unit's closure. Please address. (Also, if correct, please show the closure date of 9/1/03 shown on the Master List.)

**Response:** The Closure Date in the Master List has been changed to 9/30/03 from 9/1/03 because no exact date in Sept. 2003 could be determined.

**RCRA Unit 90.49, Page B-5:** In the Closure Info column, please include a reference to DOP Mod 9, dated 10/1/02.

**Response:** A reference to the DOP Mod has been included in the Appendix B

**RCRA Unit 95.005, Page B-6:** Unit 95.005 is shown as New Tank 1106, Rm 131, rather than 1105 Rm 131, on the RCRA Master List. Please determine which is correct then correct the Appendix or the Master List.

**Response:** The Master List is correct. It is New Tank 1105 and Appendix B has been changed.

**RCRA Unit 95.016, Page B-7:** The description, "piping closed by removal" and date of 7/2/2002, are not included on the RCRA Master List. Apparently, the ML is incomplete and should be modified.

**Response:** Piping removal has been included in the Master List.

**RCRA Unit 95.019, Page B-8:** The Master List entry shows a closure date of 8/1/05, please show the exact date if correct.

SUMMARY OF B776/777 RESPONSE TO COMMENTS TO CDPHE

**Response:** The Closure Date in the Master List has been changed to 8/31/02 from 8/1/02 because no exact date in Aug. 02 could be determined.

**RCRA Unit 777.1 (2<sup>nd</sup> entry), Page B-8:** Row 577 of the RCRA Master List shows a closure date of 4/2/04 with closure of the containment on 11/15/04. It also show a CR date of 11/15/04, versus the 11/24/04 dates shown in Appendix B. Please determine which is correct then correct the Appendix or the Master List.

**Response:** For Unit 771.1 Rm. 208 Area 10 the CR date is 11/15/04. Unit 776.1 Rm. 208 the CR date is 11/24/04. Therefore Appendix B has been changed.

**RCRA Unit 777.1 (7th entry), Page B-8:** Line 582 of the Master List is missing information shown in the Unit Description, Regulatory Status and Closure Info columns. Please check the actual Master List, electronic transfer to CDPHE may have resulted in lost data.

**Response:** Below is line 582. Therefore no changes.

777.1	777	Container Storage, Rm. 432C (17)	No longer subject to RCRA regulation	CLOSED under debris rule 12/17/03 (stainless steel floor). CDPHE approval in CR 6/24/04	12/17/03	12/17/03	776/777	N
-------	-----	----------------------------------	--------------------------------------	-----------------------------------------------------------------------------------------	----------	----------	---------	---

**RCRA Unit N/A (1<sup>st</sup> and 2<sup>nd</sup> entries), Page B-10:** If possible, provide exact closure dates for use in EPA's RCRAInfo tracking system.

**Response:** The Closure Date in the Master List for Tank V-543 in Rm. 452 has been changed from 01/2002 to 1/31/02 because no exact date in Jan 02 could be determined. The Closure Date for Tank V-605 in Rm. 131 has been changed from 7/02 to 7/31/02 because no exact date in Jul 02 could be determined.